

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
Civil Action No. 1:23-cv-39

JAUNAYD ABDUL-KAREEM,)
)
Plaintiff,)
)
v.)
)
CITY OF REIDSVILLE; ROBERT A.)
HASSELL, in his individual and)
official capacity; WENDELL)
NEVILLE, in his individual and official)
capacity; CHRISTOPHER PHILLIPS,)
in his individual and official capacity;)
and LEIGH A. BASSINGER, in her)
individual and official capacity,)
)
Defendants.)
)

JOINT FED. R. CIV. P. 26(f) REPORT

Plaintiff and Defendants, by and through their undersigned counsel, and pursuant to Federal Rule of Civil Procedure 26(f) and Local Rules 16.1(b) and 16.2 and 5.5 and respectfully submit this Joint Rule 26(f) Report.

1. Pursuant to Federal Rule of Civil Procedure 26(f) and Local Rule 16.1(b), a meeting was held telephonically on April 10, 2023. Participating in the conference were Brandon S. Atwater, for Plaintiff, and Katie Hartzog, for Defendants.

2. Discovery Plan. The parties propose to the Court the following discovery plan:

a. The parties will need discovery on the following topics: (1) Plaintiff's allegations set forth in the Complaint, including the termination of Plaintiff's employment,

relevant employment policies and procedures, Plaintiff's compensation package and fringe benefits, and relevant information regarding enforcement of Defendant City's policies at time of termination; (2) damages alleged by Plaintiff; (3) Defendants' denials of Plaintiff's allegations; (4) Defendants' affirmative defenses as set forth in Defendants' Answer; (5) any other claims or defenses that may arise during discovery; (6) all other issues raised by the pleadings; (7) any expert disclosures; and (8) all other matters relevant to the parties' claims and defenses and proportional to the needs of the case pursuant to Rule 26(b).

b. The parties agree to submit the initial disclosures in this matter by May 15, 2023.

c. The parties agree that the appropriate plan for this case is that designated in Local Rule 26.1(a)(2) as complex.

d. There are no requested modifications to the case management track at this time.

e. The date for the completion of all discovery (general and expert) is January 31, 2024. The parties agree to work cooperatively to schedule depositions and to complete all discovery within the time period established by the Court.

f. Reports from retained experts under Rule 26(a)(2) are due:

From Plaintiff by October 15, 2023.

From Defendants by December 15, 2023.

g. Each party may serve up to 25 interrogatories to another party. Answers to interrogatories will be due on the deadline set by the Federal Rules of Civil Procedure.

h. Each party may serve up to 25 requests for admission to another party. Responses to requests for admission will be due on the deadline set by the Federal Rules of Civil Procedure.

i. Each party may take up to seven depositions. The parties may mutually agree in writing to exceed the maximum number of depositions provided such agreement does not affect the other deadlines listed herein or in the Court's Scheduling Order. In the absence of an agreement, either party may move the Court for permission to conduct additional depositions without needing a separate motion to amend or revise this Report or the Scheduling Order.

j. Supplementation of discovery is due pursuant to Rule 26.

k. The deadline for dispositive motions will be 30 days after the close of discovery (March 1, 2024).

3. Plaintiff shall have until September 15, 2023 to amend pleadings or add parties. Defendants shall have until October 15, 2023 to amend pleadings or add parties.

4. Mediation should be held during the discovery period, the exact date to be set by the mediator after consultation with the parties. The parties agree that the mediator shall be Patricia Holland.

5. The parties agree that all fact depositions will be completed by the close of discovery.

6. Trial of the action is expected to take approximately six to seven days.

7. The parties will be submitting a protective order for the Court's approval for sensitive matters obtained through the discovery process.

8. The parties have discussed consenting to the jurisdiction of a magistrate judge or appointment of a special master and the parties decline reference of this case to a magistrate judge for entry of final orders.

9. The parties agree that effective and proper service of all pleadings and documents required to be served in this case may be accomplished by email.

10. Pursuant to L.R 5.5, the parties have discussed the issues of confidentiality raised in this case and the potential need for filing documents under seal. That discussion included the nature of any confidential documents that may be involved in the case, the possibility of using stipulations to avoid the need to file certain documents, and the possibility of agreed-upon redactions of immaterial confidential information in filings to avoid the need for filing documents under seal. The parties agree to use the default procedures of L.R. 5.4(C). In addition, if the party filing the motion to seal is not the party claiming confidentiality, the filing party will meet and confer with the party claiming confidentiality as soon as practicable, but at least two days before filing the documents, to discuss narrowing the claim of confidentiality. The motion to seal will certify that the required conference has occurred, and the party claiming confidentiality will file supporting materials required by L.R. 5.4(c)(3) within 14 days of the motion to seal.

10. The parties will keep the Court apprised should settlement occur.

This the 20th day of April, 2023.

/s/ Brandon S. Atwater

Counsel for Plaintiff

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CERTIFICATE OF SERVICE

I hereby certify that on April 20th, 2023, I electronically filed the foregoing ***JOINT
FED. R. CIV. P. 26(f) REPORT*** with the Clerk of Court using the CM/ECF system, which will effect service on all registered users.

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This the 20th day of April, 2023.

HARTZOG LAW GROUP LLP

/s/ KATIE WEAVER HARTZOG
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